

STATE OF TENNESSEE

Office of the Attorney General



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May 21, 2004

Honorable Deborah Taylor Tate  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

**Re: Docket 03-00391, Petition For Exemption Of Certain Services**

Dear Chairman Tate:

Enclosed is an original and thirteen copies of the Consumer Advocate and Protection Division of the Office of the Attorney General's Supplemental Responses to BellSouth Telecommunications, Inc.'s Discovery Requests. Please file the attached in the above referenced dockets. Thank you.

Sincerely,

A handwritten signature in black ink, reading "Joe Shirley".

Joe Shirley  
Assistant Attorney General  
(615)741-8700

Enclosures

cc: All Parties of Record

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**IN THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**PETITION FOR EXEMPTION OF  
CERTAIN SERVICES**

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**DOCKET NO. 03-00391**

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**CONSUMER ADVOCATE AND PROTECTION DIVISION'S  
SUPPLEMENTAL RESPONSES TO BELL SOUTH  
TELECOMMUNICATIONS, INC.'S DISCOVERY REQUESTS**

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Comes now Paul G. Summers, Attorney General and Reporter for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), pursuant to Rule 26.05 of the Tennessee Rules of Civil Procedure, and hereby submits the following supplemental responses to the discovery requests propounded by BellSouth Telecommunications, Inc. ("BellSouth"):

**SUPPLEMENTAL RESPONSES**

**BellSouth's First Discovery Request, Interrogatory No. 2: Please identify each expert witness you intend to present in this docket and, for each, please state:**

- a) the subject or subjects upon which the expert will testify;**
- b) the basis for your assertion that the witness is qualified as an expert including, but not limited to, a current curriculum vitae;**
- c) all tests, studies, measurements, experiments, or other analysis or actions performed or observed by the expert relating to the expert's testimony;**
- d) all opinions that the expert will present in this docket and the basis for each**

**opinion; and**

**e) all facts of which you or the expert are aware that support those opinions.**

**Consumer Advocate's Supplemental Response:** The Consumer Advocate does not intend to present any expert witnesses in this docket. The Consumer Advocate reserves the right, however, to present witnesses to rebut the testimony of any witnesses presented by either BellSouth or any other party to this docket.

**BellSouth's First Discovery Request, Interrogatory No. 4:** Please state whether you agree that competition for intraLATA toll services in Tennessee is an effective regulator of price for intraLATA toll service, and if you do not agree, please state why you do not agree and all facts that you believe support your position.

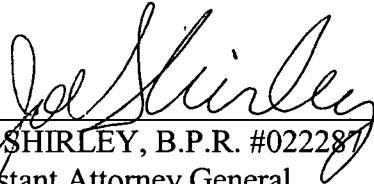
**Consumer Advocate's Supplemental Response:** For purposes of exempting the price of intraLATA toll service from price regulation, the Consumer Advocate will not contest the position that competition for intraLATA toll services in Tennessee is an effective regulator of price for intraLATA toll service.

**BellSouth's First Discovery Request, Interrogatory No. 5:** Please state whether you believe the market in Tennessee for intraLATA toll service is either more or less competitive than the market in Tennessee for interLATA service and, if you believe that the markets for these services is not comparably competitive, please explain why and state all facts upon which your position is based.

**Consumer Advocate's Supplemental Response:** For purposes of deciding the issues in this docket, the Consumer Advocate will view both the intraLATA toll service and interLATA toll service markets as being comparably competitive.

RESPECTFULLY SUBMITTED,

PAUL G. SUMMERS, B.P.R. #6285  
Attorney General  
State of Tennessee

  
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JOE SHIRLEY, B.P.R. #022287  
Assistant Attorney General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
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(615) 532-2590

Dated: May 21, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via facsimile or first-class U.S. Mail, postage prepaid, on May 21, 2004, upon:

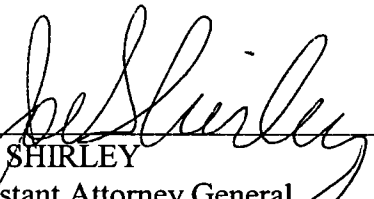
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JOE SHIRLEY  
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